

## APPENDIX D

Defendant's Motion for *Franks* Hearing

*United States v. Curcio*, 24-CR-312

**From:** Roxanne Ghezzi <rghezzi@collectors.com>  
**Sent:** Monday, February 6, 2023 9:26 PM  
**To:** Campbell, Christopher J. (NY) (FBI); Zeledon, Rigel; Grove, Allen (LA) (FBI)  
**Cc:** Jackie Curiel; Amanda Fryer  
**Subject:** Re: [EXTERNAL EMAIL] - Counterfeit and Tampered PSA Cards  
**Attachments:** Jason Donaly KYC (2).png; Tony Jay-Identity Verification - Plaid.pdf; [https\\_\\_collectorsuniverse.zendesk.com\\_tickets\\_560822\\_print.pdf](https__collectorsuniverse.zendesk.com_tickets_560822_print.pdf); Curcio Counterfeit 1T.pdf; eBay Purchase from Jason Donley (Order #06-09421-17138).pdf; Anthony Curcio (Small).pdf; Jason Donley Counterfeits.xlsx; Joe Bondarchuk Counterfeits.xlsx; Anthony Curcio Counterfeits.xlsx

Hi Chris, Rigel and Allen,

Thank you again for your time last week. We greatly appreciate all the work you do to help us with cases like these. As discussed, here is more information regarding Curcio/Donley/Bondarchuk. The PDF/image of Anthony Curcio's and Jason Donley's information as provided by PWCC is attached. For Curcio, this information includes his license and a current photo. Jason's is just his account information. Also attached is the second email we received from Curcio regarding his Reholder orders taking a long time. This might help to illustrate his attitude towards us and our products. Additionally, I've attached the PDF brief that goes over Curcio's case in detail for Allen.

**Address Information:**

Joe Bondarchuk  
417 97th DR NE  
Unit A  
Lake Stevens, WA 98258  
United States  
+14253645019  
Email unknown - PWCC likely has it

Anthony Curcio (Tony Jay)  
CURCIO MEDIA INC  
11512 158TH AVENUE NE  
REDMOND, WA 98052  
United States  
+14254058010  
[anthony@acurcio.com](mailto:anthony@acurcio.com)  
[ac38974086@icloud.com](mailto:ac38974086@icloud.com)

Jason Donley  
1555 Selby Ave Apt 415  
Saint Paul, MN 55104  
United States  
+16124259740  
[jason.donley@gmail.com](mailto:jason.donley@gmail.com)

**eBay Account Information:**

Anthony Curcio:

elcardo (Not known as any other account)

Curcio Return Address from eBay AG Items:



Jason Donley:

movies\_n\_more777 - changed to cardboardmoose after being publicly called out by Tiffany Cards

Return Address from PSA Purchase from Jason Donley's eBay:

Media Professionals  
1781 Buerkle Circle Suite A  
White Bear Lake, MN 55110

Joe Bondarchuk:

eBay information unknown. Joe does not have a PSA account. We were first informed of him by PWCC.

I was able to track what Curcio sold on his eBay before it was wiped and is available in the Excel sheet attached. Keep in mind that eBay only publicly showed his sold listings until August of 2022, so the information you have from eBay about his sales will likely have more information. For Jason Donley, I was able to find a few counterfeits he sold on his eBay account (eBay may have more) and attached is the receipt from the counterfeit that we purchased from him. The messages he sent me on eBay privately offering more counterfeits for sale off eBay (two pictured) are below:



New message from: **movies\_n\_more777** (13,963★)

Thanks so much for buying from me. I am helping my grandma go through some of my grandpa's old boxes. I found a few more good cards my grandpa has:

List of cards:

Pete Rose 1963 Topps #537 PSA 3 – sells for \$1200 on Ebay  
 Pete Rose 1963 Topps #537 PSA 6.5 – sells for \$4500 on Ebay  
 Johnny Bench 1968 Topps #247 PSA 8.5 – sells for \$2700 on Ebay  
 Carl Yastrzemski 1960 Topps #148 PSA 8 – sells for \$2500 on Ebay  
 George Brett 1975 Topps #228 PSA 8 – sells for \$600 on Ebay  
 Willie Mays 1963 Fleer #5 PSA 4 – sells for \$165 on Ebay  
 Mickey Mantle 1961 Topps #300 PSA 4 – sells for \$400 on Ebay  
 Bob Gibson 1959 Topps #514 PSA 4 – sells for \$600 on Ebay

Are you interested in any of these? If you buy a few maybe we could workout a deal. I am very fair and open to offers.

Reply



New message from: **movies\_n\_more777** (13,966★)

Ok I only have 2 cards left. I have attached pictures. Here is what I have

wayne gretzky Rookie #18 1979 o-pee-chee PSA 1 - Sells for \$750 on Ebay

Mickey Mantle 1961 Topps #300 PSA 6 - Sells for \$1,000 on Ebay

Total = \$1750

If you want these 2 cards I would do \$500 discount and make the total \$1,250.



Reply



Donley did sell some real items. If needed, I'm happy to look over any/all of Curcio and Donley's sales to confirm they are counterfeit. The guide I created to detect these counterfeit holders is also attached as "Curcio Counterfeit 1T". 1T is the style of PSA holder that has been counterfeited. It's our standard holder for sports cards. Let me know if you have any further questions about his counterfeit holder vs ours.

Curcio's M.O.:

1. Real cards that do not reflect the PSA grade (i.e. worse condition)
2. Real PSA label that has been removed from a less valuable PSA graded card for the purpose of using a chemical (likely acetone) that will remove the text from the less valuable label
3. Reprinting text of an existing certification number that is much more valuable on the cleaned label
4. Sonically welding the card and newly printed label in the counterfeit PSA holder.

Jason Donley's M.O.:

1. Real cards that do not reflect the PSA grade (i.e. worse condition) or counterfeit cards
2. Real PSA label that has been removed from an authentic PSA item graded by Donley through his PSA account or purchased by Donley either on eBay or privately.
3. Once the authentic card originally graded by PSA is separated from the holder and label, a worse condition or counterfeit card is then sonically welded in the counterfeit PSA holder with the real label. The previous card can then be sold raw or regraded by Donley.

Joe Bondarchuk's M.O.:

1. Real cards that do not reflect the PSA grade (i.e. worse condition)
2. Real PSA label that has been removed from a less valuable PSA graded card for the purpose of using a chemical (likely acetone) that will remove the text from the less valuable label. There is one card so far that uses a real label and is likely uncleaned and simply swapped from the PSA card we graded.
3. Reprinting text of an existing certification number that is much more valuable on the cleaned label
4. Sonically welding the card and newly printed label in the counterfeit PSA holder.

Interestingly, Curcio and Bondarchuk are both in Washington State, are about 45-50 minutes from each other and both appear to be cleaning and reprinting labels.

I've also attached the Excel sheets that contain all counterfeit PSA graded cards we have seen for each counterfeiter. If you have questions about the information in the sheets, please let me know. I tried to add as much information about each certification number in order to connect the dots and pinpoint victims where possible. As of right now, Jason Donley is the only person we can confirm has victims of the counterfeits he's sold as they have come through either our CRC department for verification due to being deactivated or through eBay AG. For those that came through eBay AG, when possible, I've collected the shipping address for the victim in case it's needed.

Another way we can locate victims is by contacting people who have added the cards in question to their PSA Set Registry. This is a feature for collectors to log their cards/sets online. For Curcio and Bondarchuk, it can help us to locate some of the real cards as well, since they are both cleaning and reprinting and not harvesting labels from the real product like Donley is. Curcio's sheet is only missing some values. Donley and Bondarchuk's sheets need values and Set Registry contacts. I should have all of that information by Friday and will resend the updated sheets once ready.

In the meantime, please let me know if further clarification is needed on anything. Thank you all again for your help in this case.

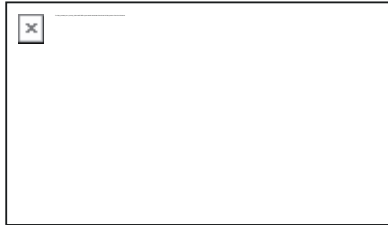
On Thu, Feb 2, 2023 at 1:03 PM Roxanne Ghezzi <[rghezzi@collectors.com](mailto:rghezzi@collectors.com)> wrote:

Hi Chris,

We have a Zoom set up but if that doesn't work let me know. Here is the Zoom link:

<https://www.google.com/url?q=https://collectors.zoom.us/j/87292735159?pwd%3DWW85c3VKTU1zQTU1Rkw3ZmpqeFdkUT09&sa=D&source=calendar&ust=1675788415159739&usg=AOvVaw18sz1ej8TIMMVqEeRoBXSd>

Kind regards,



**Roxanne Ghezzi**

Product Integrity Manager  
PSA

(949) 567-1181  
[rghezzi@collectors.com](mailto:rghezzi@collectors.com)  
[collectors.com](http://collectors.com)

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On Thu, Feb 2, 2023 at 1:00 PM Christopher Campbell <[cjcampbell@fbi.gov](mailto:cjcampbell@fbi.gov)> wrote:

Are you calling me? We are ready

646-210-9585

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**From:** Roxanne Ghezzi <[rghezzi@collectors.com](mailto:rghezzi@collectors.com)>

**Sent:** Tuesday, January 31, 2023 8:08:47 PM

**To:** Campbell, Christopher J. (NY) (FBI) <[cjcampbell@fbi.gov](mailto:cjcampbell@fbi.gov)>; Zeledon, Rigel <[rigel.zeledon@nypd.org](mailto:rigel.zeledon@nypd.org)>

**Cc:** Jackie Curiel <[curielj@collectors.com](mailto:curielj@collectors.com)>; Amanda Fryer <[fryera@collectors.com](mailto:fryera@collectors.com)>

**Subject:** Re: [EXTERNAL EMAIL] - Counterfeit and Tampered PSA Cards

Hi Chris,

Great! Jackie and I can work on setting up a time to make an introduction between you and Allen. I'll have answers to those questions ready for you when we have our call. Thanks again for your time!

Best,